

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

IMPLICIT, LLC,  
Plaintiff,

v.

IMPERVA, INC.  
Defendant.

Case No. 2:19-cv-00040-JRG-RSP  
LEAD CASE

**PLAINTIFF IMPLICIT, LLC'S AND DEFENDANT IMPERVA, INC.'S  
JOINT MOTION TO STAY ALL EXISTING DEADLINES**

Plaintiff Implicit, LLC (“Implicit”) and Defendant Imperva, Inc. (“Imperva”) (collectively, “parties”) jointly request that the Court stay all existing deadlines, including the *Markman* hearing set for this case on March 17, 2020, for thirty (30) days. The parties make this request in light of the concerns over travel and possible exposure to the coronavirus.

The actions previously consolidated with the above-captioned suit—*Implicit, LLC v. Juniper Networks, Inc.*, Case No. 2:19-cv-38 and *Implicit v. Fortinet, Inc.*, Case No. 2:19-cv-39, were stayed by this Court on February 19, 2020. Dkt. No. 230. The parties have agreed that, given the recent developments and the imminent deadlines in this case requiring domestic and/or international travel of both counsel and parties, a short stay of the instant suit is prudent. The parties make this request out of interest of justice and not to cause undue delay.

For the foregoing reasons, the parties jointly request that the Court stay all existing deadlines, including the *Markman* hearing set for this case on March 17, 2020, for 30 days. Should the Court grant the stay, the parties will jointly request a conference with the Court in order to discuss the entry of a revised Docket Control Order.

Date: March 12, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document and all attachments thereto are being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(V). Pursuant to Federal Rule of Civil Procedure 5(d) and Local Rule CV-5(d) and (e), any counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email on this 12th day of March, 2020.

/s/William E. Davis, III  
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